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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

SALEEM KHAN, et al.,

Defendants,

Case No. 3:14-CV-02743-HSG (DMR)

**STIPULATION AND PROPOSED
ORDER SUSPENDING DEADLINES AS
TO DEFENDANT AKBARI**

1 Plaintiff Securities and Exchange Commission (“Commission” or “SEC”) and defendant
 2 Ammar Akbari hereby submit the following Stipulation and Proposed Order, and request that the
 3 Court suspend upcoming deadlines as to Akbari, as follows:

4 WHEREAS counsel for the Commission, and counsel for Defendant Akbari have been
 5 working for months to determine whether a settlement of the Commission’s case as to Akbari could
 6 be reached;

7 WHEREAS the Commission’s counsel and Akbari’s counsel have arrived at a settlement in
 8 principle that the Commission’s counsel expects to recommend to the Commission itself for
 9 consideration and approval or disapproval;

10 WHEREAS the process for obtaining Commission consideration and approval requires a
 11 formal presentation of an offer to the commissioners who sit in Washington, D.C., and given the
 12 press of their business, the process typically takes approximately eight weeks to complete;

13 WHEREAS a Settlement Conference before Magistrate Judge Ryu is scheduled for March 13,
 14 2015, at which the parties and their counsel are ordered to attend;

15 WHEREAS defendant Akbari will lose much of the value of making a settlement offer early
 16 in this litigation (before the Settlement Conference and before the resumption of discovery and before
 17 his Answer is due) if he is nevertheless required to attend such events at substantial cost to him;

18 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned parties that
 19 Defendant Akbari should be relieved of the obligation to meet deadlines in this case for a period of
 20 90 days from the date of the filing of this Stipulation. If, within the 90 days, the Commission has
 21 considered and either approved or rejected the settlement offer, the SEC and Defendant Akbari will
 22 so inform the Court immediately.

IT IS SO STIPULATED:

DATED: February 27, 2015

/s/ Susan F. LaMarca

Susan F. LaMarca, Esq.
SECURITIES AND EXCHANGE
COMMISSION
44 Montgomery Street, Suite 2800
San Francisco, CA 94104
Counsel for the Plaintiff

/s/ William H. Kimball

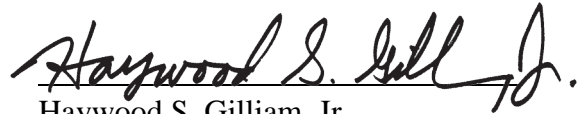
William H. Kimball, Esq.
LAW OFFICES OF WILLIAM H. KIMBALL
803 Hearst Avenue
Berkeley, CA 94710
Counsel for Defendant Ammar Akbari

~~[PROPOSED]~~ ORDER

Good cause appearing from the above Stipulation, the requested 90-day suspension of all deadlines as to Defendant Ammar Akbari is hereby GRANTED. IT IS HEREBY ORDERED THAT the Plaintiff Securities and Exchange Commission and Defendant Ammar Akbari will report to the Court no later than 90 days from the date of entry of this Order to inform the Court whether a settlement between them has been approved by both parties.

IT IS SO ORDERED.

DATED: March 2, 2015


Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT JUDGE

ATTESTATION

I, Susan F. LaMarca, am the ECF User whose identification and password are being used to file the Stipulation and Proposed Order. I hereby attest that each of the above parties or their representatives concurs in this filing to the extent indicated.

Dated: February 27, 2015

/s/ Susan F. LaMarca

Susan F. LaMarca

Attorney for Plaintiff

SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I, Karl Roeseler, am a citizen of the United States, over 18 years of age and not a party to this action. On March 2, 2015, I served the following documents:

♦ **STIPULATION AND PROPOSED ORDER SUSPENDING DEADLINES AS TO
DEFENDANT AKBARI**

via e-mail and U.S. Mail, postage pre-paid, to the following:

Roshanlal Chaganlal
4883 Thornpike Lane
Dublin, CA 94568
rchaganlal@gmail.com

The following defendants were served via the Court's CM/ECF system:

William H. Kimball, Esq.
Law Offices of William H. Kimball
803 Hearst Avenue
Berkeley, CA 94710
Attorney for Defendant Ammar Akbari

Christopher Cannon, Esq.
Sugarman & Cannon
180 Montgomery Street, Suite 2350
San Francisco, CA 94104
Attorney for Defendant Saleem Khan

Charlene S. Shimada, Esq.
Morgan, Lewis & Bockius LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Attorney for Defendant Ranjan Mendonsa

I declare under penalty of perjury that the statements made above are true and correct.

Executed in San Francisco, California March 2, 2015.

/s/ Karl Roeseler
Karl Roeseler